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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE CENTER FOR INVESTIGATIVE
REPORTING,
Plaintiff,
v.
UNITED STATES DEPARTMENT OF
JUSTICE,
Defendant.

) CASE NO. 3:17-cv-06557-JSC
)
) **JOINT STATEMENT AND STIPULATION;**
) **PROPOSED JUDGMENT**
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JOINT STATEMENT AND STIPULATION

26 Pursuant to the Court’s September 24, 2018, Order (ECF 47), Plaintiff The Center for
27 Investigative Reporting (“CIR” or “Plaintiff”) and Defendant United States Department of Justice
28 (“DOJ” or “Defendant”) respectfully submit this joint statement and stipulation and proposed final

1 judgment for the Court's consideration.

2 The parties have met and conferred regarding Plaintiff's claim for attorneys' fees and costs and
3 have reached agreement to reserve their respective rights and re-visit the issue following Plaintiff's
4 expected appeal of the Court's judgment in this action.

5 In order to permit Plaintiff's expected appeal to proceed, the parties respectfully request that the
6 Court enter the proposed judgment in this action.

7 IT IS SO STIPULATED.

8 Dated: November 1, 2018

ALEX G. TSE
United States Attorney

13 Dated: November 1, 2018

D. VICTORIA BARANETSKY

18 Pursuant to Civil Local Rule 5-1(i)(3), the undersigned hereby attests that Victoria Baranetsky
19 has concurred in the filing of this document.

21 Dated: November 1, 2018

ALEX G. TSE
United States Attorney

23 /s/ Robin M. Wall
24 Robin M. Wall
25 Assistant United States Attorney
Attorneys for Defendant
U.S. Department of Justice

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
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THE CENTER FOR INVESTIGATIVE REPORTING,) CASE NO. 3:17-cv-06557-JSC
Plaintiff,)
v.)
UNITED STATES DEPARTMENT OF)
JUSTICE,)
Defendant.)
PROPOSED JUDGMENT)

JUDGMENT

The issues having been fully considered, and the Court having granted in part and denied in part the parties' cross-motions for summary judgment, it is hereby Ordered and Adjudged that judgment be entered in part in favor of Defendant against Plaintiff, as set forth in the Court's order of July 10, 2018

**PROPOSED JUDGMENT
17-CV-06557 JSC**

1 (ECF 39) and that the action be dismissed.

2 SO ORDERED.

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4 Dated: _____, 2018

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 HON. JACQUELINE SCOTT CORLEY
United States Magistrate Judge

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